



CITY OF SAN ANTONIO

SAN ANTONIO PUBLIC LIBRARY

Tom Wheeler
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

3 July 2014

Dear Mr. Chairman and Commissioners:

Please accept this letter as a proposal for recommendations on how the FCC should fund digital access for libraries.

Libraries are a vital center for free learning, knowledge, communication, culture and enjoyment for entire communities. It is important that as we continue to provide traditional services we also evolve to meet the needs and demands of an ever mobile, internet-connected world. The San Antonio Public Library- with a Central Library and 26 branch libraries- is able to offer an extensive collection of e-books and digital resources for our patrons through access to Wi-Fi, and enhancements to network capabilities, etc.

We have spent or plan to spend about \$3 million to \$4 million from 2011 through 2014 to provide wireline and wireless access to our patrons. This includes the cost of equipment such as routers, switches, power management, wireless controllers, wireless access points, firewalls, internal cabling, as well as installation, software, and licenses.

We argue that the proposed changes to the eRate to fund libraries at \$1/square foot are unfair to urban libraries, and to patrons who are disproportionately low-income, unemployed, or underemployed.

Our libraries total approximately 554,111 square feet; thus, the cost over five years of delivering access to digital information is between \$5.41 and \$7.22 per square foot.

We also believe that using square footage ignores most factors relevant to Wi-Fi performance. Wi-Fi costs are not merely a function of the square footage of a room with wireless connectivity. Wi-Fi performance is a function of users, interference from adjacent networks in other buildings, and architectural impediments. A room of a certain size with many users will have poorer Wi-Fi service than the same room with the same network that has fewer users.

If the FCC allocates money to libraries on a per square footage basis it will send much more money to capacious, uncrowded suburban libraries and less money available for

smaller, crowded urban libraries whose patrons often have no other practical way to obtain access to the Internet for seeking employment, education, or participation in society. In general, urban libraries are more crowded and serve many more patrons in smaller spaces than suburban or rural libraries.

Moreover, a significant amount of library users bring their own devices to our buildings for downloading material, participating in educational and training sessions, conducting research and for their own entertainment.

In addition, we like many others are beginning to provide more wireless devices for use by our patrons to meet the demands of an increasingly mobile technology landscape.

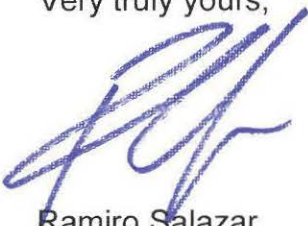
We believe that there are alternative options available, and that libraries should be allowed to choose the method that best suits their needs:

1. Fund public libraries at the rate of no less than \$4 per square foot;
2. Fund public libraries at the rate of \$150 per average daily visitor.

We request that the FCC allocate funds in a fair and equitable way that will allow libraries to continue to deliver what is sometimes the only free public Internet access available in their community. Of course, we would also support the development of program rules to help or require libraries to have efficient procurement processes and clear program guidelines that will enable all libraries to participate in available E-rate program opportunities.

We appreciate your time and consideration of this matter, and would be happy discuss these issues in more detail at any time.

Very truly yours,



Ramiro Salazar
Director, San Antonio Public Library